REMARKS/ARGUMENTS

Claims 1-13 are pending in the present application. In the Office Action mailed December 3, 2003, the Examiner rejected claims 1-13 under 35 U.S.C. § 102(b). In the above amendments, claims 1, 9 and 12 have been amended. Claims 4 and 13 have been cancelled.

Objections

The Examiner objected to the specification because the last paragraph on page 7 ended with an incomplete sentence. The incomplete sentence has been deleted.

Claim Objections

The Examiner objected to claim 4 because it was a duplicate of claim 2. Claim 4 has been cancelled.

Rejection of Claims 1-13 Under 35 U.S.C. § 102(b)

The Examiner rejected claims 1-13 under 35 U.S.C. § 102(b) based on "Experience With Secure Multi-Processing in Java" by Dirk Balfanz and Li Gong (hereinafter, "Balfanz"). This rejection is respectfully traversed.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." M.P.E.P. § 2131 (Aug. 2001) (quoting Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987)). "The identical invention must be shown in as complete detail as is contained in the ... claim." Id. (quoting Richardson v. Suzuki Motor Co., 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989)). In addition, "the reference must be enabling and describe the applicant's claimed invention sufficiently to have placed it in possession of a person of ordinary skill in the field of the invention." In re Paulsen, 30 F.3d 1475, 1479, 31 USPQ2d 1671, 1673 (Fed. Cir. 1994).

Claim 1 recites "a security manager supporting multiple applications and for limiting access to system resources according to user permissions." Claim 1 has been amended to recite that "the

multiple applications also have their own security management policies." Support for this amendment may be found in Applicants' specification on page 14, lines 4-6.

Balfanz relates generally to implementing multi-processing capabilities for the Java™ platform. Balfanz discloses a multi-processing Java™ Virtual Machine (JVM). Multiple applications are allowed to run in the multi-processing JVM. A system security manager is installed in the JVM. See Balfanz, page 404. The Examiner has asserted that the system security manager satisfies the "security manager" limitation in claim 1. See Office action, page 3.

In the environment disclosed by Balfanz, however, the multiple applications do not "have their own security management policies" as recited in claim 1. In fact, Balfanz explicitly teaches away from this approach, stating that "[w]e found no good use for application security managers." Balfanz, page 404, section 5.6.

In the Java™ platform of Balfanz, "applications can still set their own security managers." Id. However, Balfanz discusses several problems associated with making the system security manager work with application security managers:

> It is non-trivial to make the system security manager work with application security managers, if the latter override methods defined in the former and expect to be consulted for security decisions previously performed only by the system security manager. This is because application security managers, as application code, no longer have the same privileges that the system security manager enjoys. As a result, these overridden security check methods can fail when they should not.

Id. Balfanz does not propose a solution to any of these problems. Instead, Balfanz suggests that one "augment (and sometimes change) the effective behavior of the system security manager via different means, such as delegation." Id.

As can be seen from the foregoing discussion, Balfanz does not disclose all of the limitations in claim 1. Accordingly, Applicants respectfully request that the rejection of claim 1 be withdrawn.

Claims 2-3 and 5-8 depend either directly or indirectly from claim 1. Thus, Applicants respectfully request that the rejection of claims 2-3 and 5-8 be withdrawn for at least the same reasons as those provided above with respect to claim 1.

Claim 9 has been amended to recite "means for limiting access by the number of applications to system resources according to user permissions, wherein the number of applications also have their own security management policies." Support for this amendment may be found in Applicants' specification on page 13, line 9 through page 14, line 6.

As discussed above, in the Java™ platform of Balfanz, applications do not "have their own security management policies" as recited in claim 9. Accordingly, Applicants respectfully request that the rejection of claim 9 be withdrawn.

Claims 10-11 depend from claim 9. Thus, Applicants respectfully request that the rejection of claims 10-11 be withdrawn for at least the same reasons as those provided above with respect to claim 9.
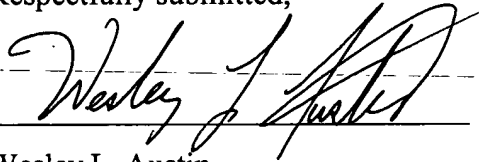
Claim 12 recites "a first set of instructions for generating a class loader for each of the transportable byte code applications." Claim 12 has been amended to recite that "the first set of instructions further associat[es] a user with each application." Support for this amendment may be found in original claim 13. Claim 12 has also been amended to recite "a fourth set of instructions for limiting access to a system resource by an application according to whether the user associated with the application has access to the system resource." Support for this amendment may be found in original claim 13. Claim 12 has also been amended to recite that "the application also has its own security management policies." Support for this amendment may be found in Applicants' specification on page 14, lines 4-6.

As discussed above, an application running in the Java™ platform of Balfanz does not "ha[ve] its own security management policies" as recited in claim 12. Accordingly, Applicants respectfully request that the rejection of claim 12 be withdrawn.

Applicants respectfully assert that claims 1-3 and 5-12 are patentably distinct from the cited references, and request that a timely Notice of Allowance be issued in this case. If there are any remaining issues preventing allowance of the pending claims that may be clarified by telephone, the Examiner is requested to call the undersigned.

Respectfully submitted,

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